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Attorney for Respondent John (Craig Turnbull)

IN THE UNITED STATES DISTRICT COURT
DISTRICT OF ALASKA

| | | |
|------------------------|---|-----------------------------------|
| JOHN ARNOLD WOODARD, |) | |
| |) | |
| Petitioner, |) | |
| |) | |
| vs. |) | Case No. 3:05-cv-0089-TMB-JDR |
| |) | |
| JOHN (CRAIG) TURNBULL, |) | <u>MOTION TO SEAL TRANSCRIPTS</u> |
| |) | |
| |) | |
| Respondent. |) | |
| _____ |) | |

Respondent respectfully requests that this court seal the two volumes of grand jury transcript the state is filing and also the transcript of proceedings on January 23, 2002. The state requests that the grand jury transcripts be sealed because they are confidential as a matter of state law. See Alaska Criminal Rule 6(l). The state requests that the January 23, 2002

proceedings involving John Murtagh's testimony be sealed because they may contain information that is confidential on account of the attorney-client privilege and because Judge Bolger ordered the proceedings during which the testimony was taken to be closed. [PCR Tr. 46-50]

Dated this December 4, 2006, at Anchorage, Alaska.

CRAIG J. TILLERY
ACTING ATTORNEY GENERAL

s/ W. H. Hawley, Jr.

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Certificate of Service

I certify that on December 4, 2006, a copy of the foregoing **Motion to seal documents and proposed order granting motion to seal documents** was served on electronically on Hugh W. Fleisher.

s/ W. H. Hawley, Jr.